

1 THOMAS G. GILMORE, ESQ.
2 State Bar No. 91984
3 LAW OFFICES OF THOMAS G. GILMORE
3232 FOURTH AVENUE
3 SAN DIEGO, CALIFORNIA 92103
4 (619) 426-4444

5 Attorney for Material Witness

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8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) CASE NO. 08CR0248
11) 08MJ0115
11 Plaintiff,) DECLARATION OF THOMAS G. GILMORE
12) IN SUPPORT OF MOTION FOR
12 vs.) VIDEOTAPE DEPOSITION AND
13) SUBSEQUENT VOLUNTARY DEPORTATION
13 GABRIEL CASTRO,) OF MATERIAL WITNESSES
14)
14 Defendant.) DATE: February 14, 2008
15) TIME: 9:30 am
15) PLACE: Courtroom of Magistrate
16) Nita L. Stormes

17 I, Thomas G. Gilmore declare:

18 I am an attorney duly licensed to practice before all the
19 courts of this State, District and Circuit, and am the attorney of
20 record for the material witness in the above action, a minor
21 designated by the name "A.G.R.".

22 I have personal knowledge of the facts set forth in this action
23 and could testify competently thereto if called.

24 My client in this action has been in federal custody since
25 January 15, 2008 because he cannot locate anyone to post bond for
26 him.

27 My client, "A.G.R.", who is seventeen years old, entered the
28 United States to find work to support family members at home in

1 Mexico. Each day he remains in custody is an additional hardship on
2 himself and his family.

3 Based on the above it respectfully requested that this motion
4 be granted, that said deposition take place at the earliest possible
5 time, and that my client be allowed to voluntarily return home to
6 Mexico immediately thereafter.

7 I declare under the penalty of perjury under the laws of the
8 State of California that the foregoing is true and correct of my own
9 personal knowledge except as to those matters stated to be based
10 upon information and belief and, as to those matters, I am informed
11 and believe that they are true and correct.

12 Executed this 13th of February, 2008, in San Diego, California.

13 /ss/ Thomas G. Gilmore
14 THOMAS G. GILMORE, Attorney for
15 Material Witness
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